IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

INTERNATIONAL BUSINESS MACHINES CORPORATION,

No. 06-cv-13565 (CLB)(MDF)

Plaintiff and Counterclaim-Defendant,

MOTION TO ADMIT COUNSEL PRO HAC VICE

PLATFORM SOLUTIONS, INCORPORATED,

v.

Defendant and Counterclaim-Plaintiff.

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Eastern and Southern Districts of New York, I, Elena K. Chan, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

> D. Skylar Rosenbloom PHELPS DUNBAR LLP 365 Canal Street, Suite 2000 New Orleans, Louisiana 70130 Telephone: (504) 584-9295 Facsimile: (504) 568-9130

Email: Skylar.Rosenbloom@phelps.com

D. Skylar Rosenbloom is a member in good standing of the Bar of the 1. State of Louisiana.

2. There are no pending disciplinary proceedings against D. Skylar

Rosenbloom in any State or Federal court.

Dated: December 14, 2007

New York, NY

Respectfully submitted,

Bruce E. Gerstein (BG-2726) Noah Silverman (NS-5728) Elena K. Chan (EC-2337)

GARWIN GERSTEIN & FISHER LLP

1501 Broadway, Suite 1416 New York, New York 10036

Tel.: 212-398-0055 Fax: 212-764-6620

Attorneys for Intervenor, T3 Technologies Inc.

United States of America

State of Louisiana

Supreme Court of the State of Louisiana

I, JOHN TARLTON OLIVIER, Clerk of the Supreme Court of the State of Louisiana, do hereby certify that

DEGAN SKYLAR ROSENBLOOM, ESQ., #31309

was duly admitted and licensed to practice as an attorney and counselor at law in this Court and the several courts of the State of Louisiana, on the 18th Day of October, 2007 A.D.; and is currently in good standing, and sufficiently qualified to perform the duties of an attorney and counselor at law.

IN WITNESS WHEREOF, I hereunto sign my name and affix the seal of this Court, at the City of New Orleans, this the 5th Day of December, 2007, A.D.

Clerk of Court
Supreme Court of Louisiana

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

X

INTERNATIONAL BUSINESS	<u> </u>
MACHINES CORPORATION,	: No. 06-cv-13565 (CLB)(MDF)
Plaintiff and Counterclaim- Defendant, v. PLATFORM SOLUTIONS, INCORPORATED, Defendant and Counterclaim- Plaintiff.	: AFFIDAVIT OF ELENA K. CHAN IN SUPPORT OF MOTION TO ADMIT COUNSEL
	: PRO HAC VICE
	: : :
	: : :
	x
State of New York) ss:	
County of New York)	

Elena K. Chan, being duly sworn, hereby deposes and says as follows:

- 1. I am an associate at Garwin Gerstein & Fisher LLP, counsel for Intervenor, T3 Technologies, Inc., in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Intervenor's motion to admit D. Skylar Rosenbloom as counsel *pro hac vice* to represent Intervenor, T3 Technologies, Inc., in this matter.
- 2. I am a member in good standing of the New York and New Jersey state bars, and was admitted to practice law in these jurisdictions on July 27, 2005 and December 7, 2004, respectively. I am also admitted to the United State District Courts for the Southern and Eastern Districts of New York, and the District of New Jersey, and am in good standing with these Courts.

- 3. I have known D. Skylar Rosenbloom since 2007.
- 4. D. Skylar Rosenbloom is an associate at Phelps Dunbar LLP in New Orleans, Louisiana.
- 5. I have found D. Skylar Rosenbloom to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
- 6. Accordingly, I am pleased to move this Court to admit D. Skylar Rosenbloom, *pro hac vice*.
- 7. I respectfully submit a proposed order granting the admission of D. Skylar Rosenbloom, *pro hac vice*, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit D. Skylar Rosenbloom, *pro hac vice*, to represent Interventor, T3 Technologies, Inc. in the above-captioned matter, be granted.

Dated: December 14, 2007

New York, NY

Respectfully submitted,

Bruce E. Gerstein (BG-2726) Noah Silverman (NS-5728) Elena K. Chan (EC-2337)

GARWIN GERSTEIN & FISHER LLP

1501 Broadway, Suite 1416 New York, New York 10036

Tel.: 212-398-0055 Fax: 212-764-6620

Attorneys for Intervenor, T3 Technologies Inc.

Sworn to before me this 14th day of December, 2007

JANET SEIDMAN
Notary Public State Of New York
No. 24-4705123
Qualified in Kings County
Commission Expires January 31, 20 / C

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

_____x INTERNATIONAL BUSINESS :

MACHINES CORPORATION, : No. 06-cv-13565 (CLB)(MDF)

Plaintiff and Counterclaim- : ORDER FOR ADMISSION

Defendant : PRO HAC VICE

Defendant, : PRO HAC VICE ON WRITTEN MOTION

PLATFORM SOLUTIONS, INCORPORATED,

v.

Defendant and Counterclaim- : Plaintiff. : x

Upon the motion of Elena Chan, attorney for Intervenor, T3 Technologies, Inc. and said sponsor attorney's affidavit of support;

IT IS HEREBY ORDERED that

D. Skylar Rosenbloom PHELPS DUNBAR LLP 365 Canal Street, Suite 2000 New Orleans, Louisiana 70130 Telephone: (504) 584-9295 Facsimile: (504) 568-9130

Email: Skylar.Rosenbloom@phelps.com

is admitted to practice *pro hac vice* as counsel for Intervenor, T3 Technologies, Inc. in the above-captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. As this action is

assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated:

White Plains, NY

United States District/Magistrate Judge